

From: Amy D Kyle

Sent: Thursday, July 01, 2004 11:55 AM

To: Hall, Malinda

Subject: comments on EJ workshop materials

Hi Malinda,

Unfortunately I was not able to attend the workshop because of other commitments but I have a few suggestions:

For the precautionary policy tasks:

I would suggest that you also identify obstacles to precautionary actions, while you are looking at examples. You may elicit information about obstacles that could be removed. (I can think of several myself.)

At some point you will probably need to think about the relationship between risk assessment and precautionary policies and approaches. In my view, risk assessments can be conducted in ways that are precautionary. Or not. There are no professional practices or standards that govern this. Community groups are understandably wary and suspicious of risk assessments used to show "why there is no problem." On the other hand, risk assessments underlie relatively precautionary approaches under Prop 65. This might be something that you will need to think about.

Priority 2 -- cumulative impacts.

Trying to develop a single definition of this will be a challenge. It is not to say that it cannot be done, but that no one has done it yet. The NEJAC work suggests that there should be a deliberative component to this, which I think is a good approach, rather than simply a technical definition. There is probably a lot to say about approaches that you might actually take, more appropriately left to a later date. I guess the bottom line is to structure this in such a way that you don't get hung up on this step and to make sure you have a way to incorporate everything that you learn in each community into the program as a whole. (Some people call this "adaptive management."

Overall comments -- to address environmental justice you also need to think about addressing the entirety of the "built environment" not just the part that has historically been considered under the jurisdiction of environmental agencies. This may mean collaboration with education, transportation, and health departments (probably among others.) Schools themselves can be environments of major concern for children and pose their own environmental justice issues, and I think this needs to be part of

your overall thinking and framework.

I wish you well with this effort. Please give my best to Tam as well.

Cheers
adk

Amy D Kyle PhD MPH
Research Scientist and Lecturer
School of Public Health, University of California
Berkeley